

EXHIBIT A

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

TANAYIAH HOWELL,

Plaintiff,

v.

Case #20 - - NI

GREYHOUND LINES, INC., a foreign corp,
and GERALD SNYPE,

HON:

Defendants,

ISAIAH LIPSEY (P57361)

Attorney for Plaintiff

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A civil action between these parties or other parties arising out of the same transaction or occurrence as alleged in the complaint has been previously filed in Wayne County Circuit Court. The docket number and judge of the civil action are: 19-011356- NF and JUDGE SUSAN L. HUBBARD. This action was transferred to Federal Court.

By: Isaiah Lipsey
Isaiah Lipsey (P57361)

COMPLAINT

NOW COMES the Plaintiff, TANAYIAH HOWELL, by and through Plaintiff's attorney, Isaiah Lipsey, and in support of this Complaint states as follows:

1. That PLAINTIFF, TANAYIAH HOWELL, is a resident of the City of Detroit, County of Wayne and State of Michigan.
2. Defendant, GREYHOUND LINES, INC. conducts a regular and systematic part of its business within the County of Wayne, State of Michigan.

3. Defendant, GERALD SNYPE, is a resident of the City of South Euclid, County of Cuyahoga, and State of Ohio.

4. That the amount in controversy is within the jurisdiction of this Court since the claim for damages is in excess of Twenty-Five Thousand (\$25,000.00) Dollars.

5. That on or about October 16, 2018, Plaintiff, TANAYIAH HOWELL, was a passenger of a Greyhound Bus, with a ticket purchased in and boarding the bus in Detroit, County of Wayne, Michigan.

6. That on or about October 16, 2018, Defendant, GERALD SNYPE, was the driver of the Greyhound Bus on which Plaintiff, TANAYIAH HOWELL, was a passenger, when he lost control of the bus, causing serious injuries to Plaintiff and other passengers.

COUNT I – NEGLIGENCE

7. Plaintiff incorporates by reference paragraphs 1 through 6 as though more fully set forth herein.

8. Prior to and at the time of the incident, Defendants, breached duties owed to Plaintiff including, but not limited to:

- (a) failing to operate the vehicle in a careful and prudent manner in violation of MCL 257.626;
- (b) failing to maintain a proper lookout, keep proper observation, maintain control of the vehicle, and otherwise failing to comply with the common law duty to use reasonable and ordinary care under these circumstances;
- (c) failing to operate the vehicle with sufficient control in order to safely stop on the roadway;
- (d) failing to apply brakes to avoid losing control and leaving the roadway;
- (e) operating the vehicle needlessly, recklessly and carelessly in disregard of the rights and safety of plaintiff without due caution;

- (f) operating the vehicle in derogation of posted speed limits;
- (g) operating a vehicle with inadequate equipment; and
- (h) failing to act in an ordinary and reasonable manner under the given circumstances.

9. As a direct and proximate result of Defendant's, negligence, Plaintiff has suffered serious impairment including, but not limited to:

- (a) Cervical trauma;
- (b) Muscular problems in neck;
- (c) traumatic injury to back;
- (e) traumatic injury to head;
- (d) loss of enjoyment of life;
- (e) fright;
- (f) shock;
- (g) embarrassment;
- (h) humiliation; and
- (I) great mental anguish.

10. As a direct and proximate result of Defendants' negligence, Plaintiff will experience pain and suffering, along with present and future damages, will require further treatment for her injuries.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter a judgment against Defendant in an amount in excess of Twenty-Five Thousand and 00/100 (\$25,000.00) Dollars

together with costs, interest, attorney fees and any other relief that this court deems just.

Respectfully submitted,

/s/ Isaiah Lipsey

ISAIAH LIPSEY (P57361)

Attorney for Plaintiff

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Dated: May 16, 2020